



INFORMATIONAL MEMO

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TITLE: ELECTRONIC VISIT VERIFICATION IMPLEMENTATION TIMELINE UPDATE

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**DIVISION AND OFFICE: BENEFITS & SERVICES MANAGEMENT DIVISION,
OFFICE OF COMMUNITY LIVING**

PROGRAM AREA: ELECTRONIC VISIT VERIFICATION

APPROVED BY: SARAH HOERLE

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LTSS, PERSONAL CARE, HOME HEALTH, CURES ACT**

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Purpose and Audience:

The purpose of this Informational Memo is to inform Electronic Visit Verification (EVV) stakeholders of implementation timeline updates.

Information:

Section 12006 of the 21st Century Cures Act mandates that State Medicaid agencies implement an Electronic Visit Verification (EVV) system for Personal Care and Home Health Services. An EVV system will electronically verify that home or community-based service visits occur by documenting the client, service, attendant, location, date, and time that service provision begins and ends. States that do not implement EVV by required deadlines will incur an escalating reduction of Federal funding.

A Federal [EVV delay bill](#) was signed into law in July 2018 delaying the penalty of reduced Federal matching funds for EVV required services from January 1, 2019 until January 1, 2020. The Department will utilize the additional time granted by Federal legislation and not mandate the use of EVV on January 1, 2019. Upon the new implementation date of January 1, 2020, EVV will be required for the services listed below. Mandated services will require corresponding EVV data for claims processing.

On August 7, 2018, the Department released an informational memo regarding the implementation of EVV in Colorado. That memo can be found on the Department's website, located [here](#). Within that release, the Department indicated that an updated

implementation timeline would be communicated to stakeholders. Below is the updated implementation timeline.

Please note, due to the complexities of system design, the dates below may be subject to change. Significant shifts in the timeline will be communicated to stakeholders.

EVV Implementation Timeline

Phase I of EVV Implementation is the development and deployment of the State EVV system. Phase I is calendared from July 2018 – April 2019.

PHASE I		
Implementation Action	State Date	Completion Date
Project Kick off with Vendor	July 2018	August 2018
Create System Rules for State EVV Solution	July 2018	November 2019
Develop and Finalize Training Plan	October 2018	November 2018
Release Specification(s) for Provider Choice Systems	December 2018	December 2018
User Acceptance Testing for State EVV Solution	February 2019	February 2019
Data Aggregator Deployment	March 2019	Ongoing
State EVV System Deployment	March 2019	Ongoing
Test Provider Choice System Interfaces to Ensure Successful Data Transfer	March 2019	Ongoing
Provider Training	April 2019	Ongoing
Pilot Phase for State EVV System	April 2019	April 2019

Phase II of EVV Implementation will include a Soft Launch of the State EVV System and development and deployment of the Consumer Directed Suite and the Scheduling Module. Phase II is calendared for April 2019 – December 2019. *As noted, the dates below may be subject to change. Significant shifts in the timeline will be communicated to stakeholders.*

PHASE II		
Implementation Action	Start Date	End Date
Phase II Kick Off	April 2019	April 2019
Collect Stakeholder Feedback Specific to Consumer Directed and Scheduling Modules	April 2019	December 2019
Stakeholder Feedback & Medical Services Board for EVV Colorado Code of Regulations Rule	December 2018	May 2019
Soft Launch <i>[Provider use of State EVV System or Provider Choice System & Aggregator]</i>	August 2019	December 2019

Phase III of EVV Implementation will be Go Live for mandatory use and ongoing improvements. Phase III is calendared to begin January 1, 2020.

PHASE III		
Implementation Action	State Date	Completion Date
Go Live! <i>[Mandatory use of State EVV system or Provider Choice System & Aggregator, claims will potentially deny without verification of required services]</i>	January 1, 2020	Ongoing
System and Policy Improvement	January 1, 2020	Ongoing

Accountability Standards

In addition to the timeline above, the Department has set a series of standards to hold itself and our vendor accountable to implementing the State EVV System. The first metric completed was amending and approving the DXC contract this past August. The Department is currently developing business and system rules for the State EVV System.

These decisions are guided by the Federal mandate, system capabilities, and stakeholder input gathered through engagement meetings. The Department is working to finalize the training plan for the State EVV System this November and ensures it will be accessible and available through multiple modalities.

In February of 2019, the Department will welcome various stakeholders to work on User Acceptance Testing (UAT). This will be an opportunity to test the State EVV System to ensure it functions correctly and does not encounter any major errors. Major system errors will be resolved immediately. Issues found to have a temporary solution or be cosmetic in nature will be resolved after UAT is complete.

In April 2019, the Pilot Phase for the State EVV System will begin. The Pilot Phase will allow providers to use the system in practice and provide feedback on the system as it functions on the ground. Stakeholder feedback from the Pilot Phase will be used to update the State EVV System in Phase II and III. The Department will outline an action plan for system and policy improvement based on Pilot feedback. Following the Pilot, the Department will provide training for all providers using the State EVV System. Training will be available in a classroom setting, via webinar, or through self-learning documents. The Department will require that all providers mandated under EVV be trained prior to Go-Live. Providers must complete training to receive sign-on credentials for the State EVV System or the Data Aggregator, for those who utilize a Provider Choice system.

For providers who choose to use a Provider Choice system, the Department will release specifications for third-party EVV systems at the end of 2018. The Department and EVV vendor, Sandata, will work with stakeholders to confirm that specifications meet provider needs. Sandata will begin validating Provider Choice systems in March 2019. At this time, providers will learn how to interface with and utilize the Data Aggregator. Sandata will be readily available for technical assistance as providers interface systems.

Starting in spring of 2019 through the end of the year, the Department will develop and deploy the Scheduling and Consumer Directed Modules. Development of these modules will require significant guidance from stakeholders and the Department commits to robust stakeholder engagement and transparency during this process. Once these modules are built, the Department and stakeholders will complete UAT to ensure sufficient functionality.

In August 2019, the Department will expect provider agencies to utilize the State EVV System or their Provider Choice system and Data Aggregator. This will be a time for provider agencies and clients to adapt to the use of EVV without impact to claims. During

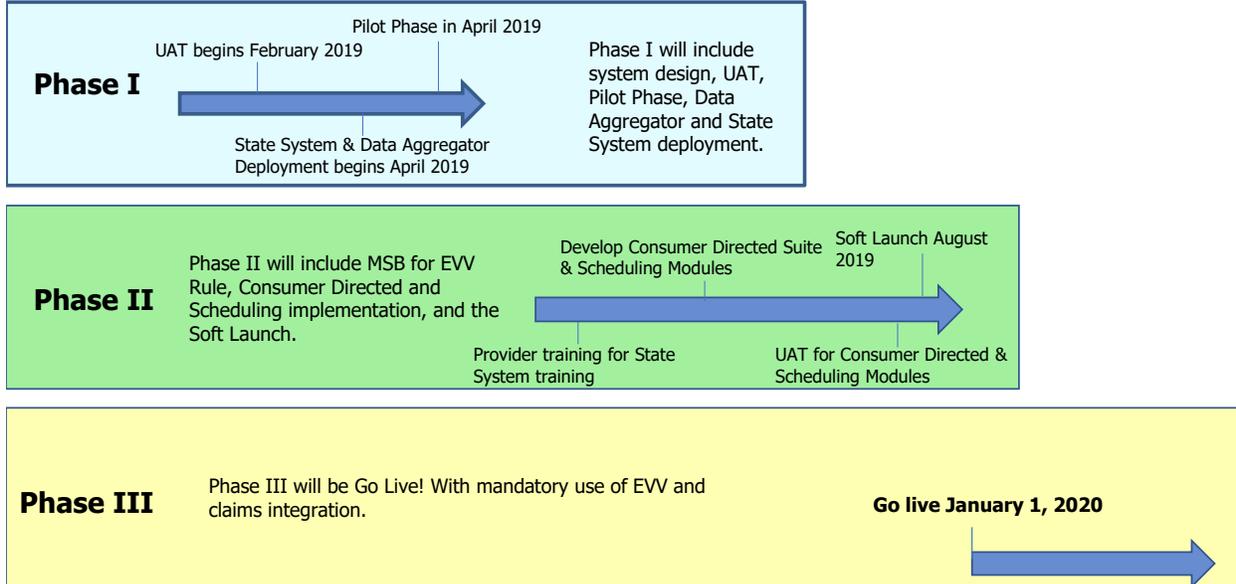
this Soft Launch, the Department and EVV vendor will be available to answer questions and concerns. Additionally, the Department will complete data analysis to determine which providers are not utilizing EVV adequately and reach out to provide direct technical assistance. During this time, the Department will also generate reports which indicate the percent of required claims that fail to meet EVV requirements.

Following the Soft Launch, the Department will comply with the federal mandate and require provider agencies to utilize EVV by January 1, 2020. Failure to submit EVV for required services will impact claims processing. Prior to this, the Department will closely review compliance reports to certify that claims integration will not have negative impacts on providers. The Department and EVV vendor will remain available during this transition for questions, concerns, and onboarding of provider agencies.

Colorado EVV Mandated Services*	
<ul style="list-style-type: none"> ✓ Behavioral Services (provided in the home) ✓ Consumer Directed Attendant Support Services (CDASS) ✓ Durable Medical Equipment (requiring in-home set up) ✓ Home Health (RN, LPN, CNA, PT, OT, SLP) ✓ Homemaker ✓ Hospice ✓ In-Home Respite ✓ In-Home Support Services (IHSS) 	<ul style="list-style-type: none"> ✓ Independent Living Skills Training (ILST) ✓ Occupational Therapy (provided in the home) ✓ Outpatient Physical Therapy ✓ Pediatric Behavioral Services ✓ Pediatric Personal Care ✓ Personal Care ✓ Private Duty Nursing ✓ Speech Therapy (provided in the home) ✓ Youth Day

** Subject to change per Federal guidance*

EVV Implementation Timeline:



Attachment(s):

Delay Bill H.R. 6042: <https://www.congress.gov/bill/115th-congress/house-bill/6042?r=7>

Colorado EVV website: <https://www.colorado.gov/pacific/hcpf/evv>

Document posted on Colorado EVV website:
<https://www.colorado.gov/pacific/sites/default/files/Colorado%20EVV%20Timeline%20Update-November%202018.pdf>

Please join our EVV distribution list via [Constant Contact](#)

Department Contact:

Lana Eggers, HCBS Policy Advisor
EVV@state.co.us